

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

WASSERMAN, JURISTA & STOLZ, P.C.

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Trustee

**SCOTT S. REVER (SR 1425)**

In Re:

**NICHOLAS TARSIA,**

Debtor.

Case No.: 12-15709 DHS

Honorable Donald H. Steckroth

Chapter: 7

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**NOTICE OF MOTION FOR AN ORDER COMPELLING THE DEBTOR TO  
TURNOVER PROPERTY OF THE ESTATE AND PRODUCE DOCUMENTS, AND  
COMPELLING AND DIRECTING PAYMENTS DUE ON NOTES RECEIVABLE BE  
PAID TO THE TRUSTEE**

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TO: Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

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Joni Property Trust, LLC  
Attn: Joseph F. Spezio, III  
22 Beachfront Lane  
New Rochelle, NY 10805

**PLEASE TAKE NOTICE**, that on the date and time set forth in the Order Shortening Time transmitted herewith, the undersigned, as counsel for Robert B. Wasserman, Chapter 7 Trustee, ("Trustee"), shall move before the Honorable Donald H. Steckroth, United States Bankruptcy Judge, at the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, Newark, New Jersey 07102, seeking the entry of an Order compelling the Debtor to turnover property of the estate and produce documents, and compelling and directing payments due on notes receivable be paid to the Trustee, together with such other and further relief as may be just and proper.

**PLEASE TAKE FURTHER NOTICE**, that the undersigned shall rely upon the Motion filed herewith in support of the relief sought.

**PLEASE TAKE FURTHER NOTICE**, that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE**, that no brief is being filed herewith since the relief requested does not involve any novel or complex issues of law.

**PLEASE TAKE FURTHER NOTICE**, that all objections must be in writing, filed with the Clerk of the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3<sup>rd</sup> Floor, P.O. Box 1352, Newark, New Jersey 07102, and a copy thereof must simultaneously be

served upon Wasserman, Jurista & Stolz, P.C., Attn: Scott S. Rever, Esq., 225 Millburn Avenue, Suite 207, Millburn, New Jersey 07041 so as to be filed and received as set forth in the Order Shortening Time.

**PLEASE TAKE FURTHER NOTICE**, that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Respectfully submitted,

**WASSERMAN, JURISTA & STOLZ, P.C.**  
Attorneys for Robert B. Wasserman, Chapter 7  
Trustee

Date: April 26, 2012

/s/ SCOTT S. REVER  
SCOTT S. REVER